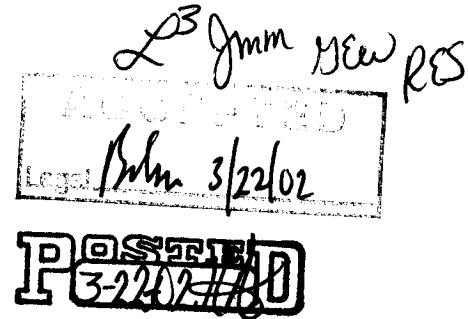




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**Caroline N. Watson**  
General Counsel - South Carolina



1 29669  
Street Address:  
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Columbia, South Carolina 29201

March 21, 2002

The Honorable Gary E. Walsh  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211



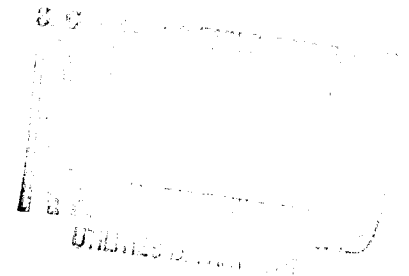
Re: Application of BellSouth Telecommunications, Inc. to  
Provide In-Region InterLATA Services Pursuant to  
Section 271 of the Telecommunications Act of 1996  
Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed please find for filing an original and 15 copies  
of BellSouth's Response to Petition for Reconsideration and/or  
Clarification of AIN and Nuvox. By copy of this letter, I am  
serving all parties of record with a copy of this pleading as  
indicated on the attached Certificate of Service.

Sincerely,

Caroline N. Watson



CNW/nml  
Enclosure  
cc: All Parties of Record

BEFORE THE

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2001-209-C

|   |   |                 |
|---|---|-----------------|
| Application of BellSouth Telecommunications, Inc. To Provide In-Region InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996 | ) | RESPONSE TO     |
|   | ) | PETITION FOR    |
|   | ) | RECONSIDERATION |

SC PUBLIC SERVICE  
COMMISSION

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO PETITION FOR RECONSIDERATION AND/OR CLARIFICATION OF AIN AND NUVOX**

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to the Petition for Reconsideration and/or Clarification of Access Integrated Networks ("AIN") and Nuvox Communications and states as follows:

A. Language On UNE Combinations

AIN and Nuvox seek reconsideration of an inconsistency that does not exist. The Commission was explicit in its UNE Cost Order that BellSouth has no legal obligation to combine for CLECs at cost-based rates UNEs that are not currently combined in BellSouth's network. The Commission stated that "[w]e do not waiver from that decision on legal grounds." In its Section 271 Order, the Commission reiterated the legal grounds that make clear that BellSouth is not obligated to provide CLECs with new combinations at cost-based rates.

That being said, for policy reasons to promote increased competition, the Commission in the UNE Cost Docket ordered that BellSouth must provide new combinations at cost-based rates. In the subsequent Section 271 Order, the Commission explicitly referred back to the UNE Cost Order and the language contained therein when it addressed this issue. This express deferral to the UNE Cost Order indicates that the

Section 271 Order does not in any way modify the UNE Cost Order. Thus, the Commission need not clarify the Section 271 Order.

B. Filing The IPP

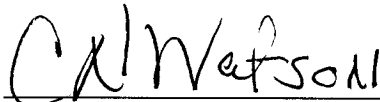
BellSouth will file the IPP when it files its SGAT or at such other time as the Commission deems appropriate.

C. Monthly Performance Data

In its Petition, the petitioners suggested that BellSouth post the performance data on a web site. BellSouth has posted its performance data on the Internet at (<http://www.interconnection.bellsouth.com/mss/index.html>) for a number of years and will continue to do so. This is the most efficient means for all parties to review BellSouth's performance data. Consequently, BellSouth respectfully requests that the Commission decline to modify this process.

This 21st day of March, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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ATTORNEYS FOR BELLSOUTH

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

)  
)  
)

CERTIFICATE OF SERVICE

SC PUBLIC SERVICE  
COMMISSION

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The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth's Response to Petition for Reconsideration and/or Clarification of AIN and Nuvox in Docket No. 2001-209-C, to be served by the method indicated below upon the following this March 21, 2002:

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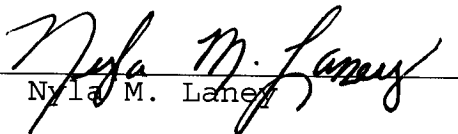
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\_\_\_\_\_  
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